



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW MICHAEL JUAREZ,

Defendant.

Case: 1:21-cr-20444
Judge: Ludington, Thomas L.
MJ: Morris, Patricia T.
Filed: 07-07-2021
INDI USA v. Andrew Juarez (tt)

FILED
JUL 07 2021

U.S. DISTRICT COURT
FLINT, MICHIGAN

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
(18 U.S.C. § 2422(b))
(Attempted Enticement of a Minor)

On or about June 16, 2021, in the Eastern District of Michigan, the defendant ANDREW MICHAEL JUAREZ, a 24-year-old man, used a facility and means of interstate commerce, the Internet, to attempt to knowingly persuade, induce, and entice an individual whom he believed was 14 years old, to engage in sexual activity for which any person could be charged with a criminal offense, in violation of Title 18, United States Code Section 2422(b).

FORFEITURE ALLEGATIONS

(Criminal Forfeiture - 18 U.S.C. § 2253(a), 18 U.S.C. § 1467(a))

The allegations contained in Count One of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253(a).

Upon conviction of Count One of the Indictment, defendant ANDREW MICHAEL JUAREZ, shall, pursuant to 18 U.S.C. § 2253, forfeit to the United States his interest in the following:

1. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 220, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of these subsections;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Forfeiture include, but is not limited to, the forfeiture of defendant's interest to the United States in the following property:

- One (1) Apple iPhone Model A2342.

If any of the property described in the paragraphs above as being forfeitable pursuant to 18 U.S.C. § 2253, as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

the United States of America, pursuant to 21 U.S.C. § 853(p), intends to seek forfeiture of all other property of the defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

Dated: July 7, 2021

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA MOHSIN
Acting United States Attorney

ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

s/Anca I. Pop
ANCA I. POP (P70032)
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Companion Case information MUST be completed by AUS,United States District Court
Eastern District of Michigan**Criminal Case Cove**Case: 1:21-cr-20444
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned: Thomas L. Ludington
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: AIP

Case Title: USA v. Andrew Michael Juarez**County where offense occurred:** Saginaw**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

 Indictment/ Information --- **no** prior complaint.
 X Indictment/ Information --- based upon prior complaint [Case number: 21-mj-30320]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

Date: July 7, 2021

s/Anca I. Pop
 Anca I. Pop
 Assistant United States Attorney
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 Attorney Bar #: P70032

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.